

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA		12 Cr. 934 (RA)
v.		The Hon. Ronnie Abrams
VANESSA BANDRICH,		
Defendant.		DECLARATION OF SEAN M. MAHER, ESQ.

I, SEAN M. MAHER, ESQ., an attorney duly licensed to practice in all courts in the State of New York, and the United States District Court for the Southern District of New York, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I represent Ms. Vanessa Bandrich in the above-captioned proceeding, having been assigned under the Criminal Justice Act. I am familiar with the facts of this case. The following declaration is based upon my participation in the trial of Ms. Bandrich, my review of transcripts and other documents filed with the Court and of the discovery disclosed by the government, as well as conversations and correspondence with the assigned Assistant United States Attorneys and the counsel for the co-defendants, and other investigation.
2. This affirmation is submitted in support of Ms. Bandrich's Rule 29 motion, Rule 33 motion, and motion to join in the motions of the co-defendants.
3. Counsel certifies that all statements in the motion that are not otherwise supported by cited authority are true and correct upon information and belief.

4. For the reasons set forth herein, in the notice of motions, and in the accompanying motions and memorandum of law, it is respectfully submitted that Ms. Bandrich's motions should be granted.

Dated: September 5, 2014
New York, New York

Respectfully submitted,

/S/
SEAN M. MAHER
SM7568
Counsel for the Defendant Vanessa Bandrich
The Law Offices of Sean M. Maher, PLLC
233 Broadway, Suite 801
New York, NY 10279
(212) 661-5333
(212) 227-5808 fax